

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**  
SEP 26 2005  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA )  
 )  
 v. ) No. 96 CR 815  
 ) CHIEF JUDGE  
LEE JACKSON, Jr., and ) CHARLES P. KOCORAS  
JAMES P. YOUNG )

GOVERNMENT'S AGREED MOTION FOR AN EXTENSION OF TIME TO RESPOND  
TO DEFENDANTS' SUBMISSIONS IN SUPPORT OF A FULL SENTENCING REMAND

Now comes the United States of America, through its attorney, Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, and respectfully moves for an extension of time in which to respond to the Submissions of Defendant Jackson and Defendant Young in Support of Full Sentencing Remand, and states in support as follows:

1) Due to unforeseen circumstances and trial schedules, the undersigned AUSA has been unable to file the government's response to the defendants' Submissions in Support of Full Sentencing Remand before the date upon which it was due, September 16, 2005.

2) The undersigned AUSA completed a trial in United States v. Ratliffe-White on September 12, 2005. On September 13, 2005, a death in the family caused family members who were providing child care to travel out of state for a week. The undersigned AUSA was required by this unforeseen event to reduce his work schedule for a week to provide child care. The undersigned AUSA is currently on trial in United States v. Anderson (04 CR 789), which trial is

expected to be completed by October 3, 2005. Preparations for that trial took the prior 5 business days. The undersigned AUSA took his laptop computer home over the past weekend in order to complete the draft of the government's response in this case, but was restricted from access to the files. The access was restored by computer technicians on the date of this filing.

3) The undersigned AUSA has no other matters scheduled after the Anderson trial, and will be able to complete the government's response on or before October 10, 2005.

4) Counsel for defendants Jackson and Young have no objection to an additional extension of time in which the government must file its response.


Wherefore the United States of America respectfully requests an extension of time in which to file its response to October 10, 2005.

Respectfully Submitted,

PATRICK J. FITZGERALD  
United States Attorney

September 26, 2005

By:

  
BRIAN PATRICK NETOLS  
Assistant U.S. Attorney  
312-353-4128

UNITED STATES DISTRICT COURT 128  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA                    )  
  )  
                  v.                                )  
  )  
EDWARD LEE JACKSON, JR., and                )  
JAMES P. YOUNG                                )

No. 96 CR 815  
CHIEF JUDGE  
CHARLES P. KOCORAS

CERTIFICATE OF SERVICE

It is hereby certified that service of **GOVERNMENT'S AGREED  
MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DEFENDANTS'  
SUBMISSIONS IN SUPPORT OF A FULL SENTENCING REMAND** has been made on  
defendant this 26th day of September, 2005, via United States Mail  
to the following individuals:

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Attorney for Defendant James Young  
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Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

September 26, 2005 BY: Brian P. Netols  
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